

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 22-CR-20114-KMW**

UNITED STATES OF AMERICA

vs.

CARLOS RAMON POLIT FAGGIONI

Defendant.

**UNITED STATES' NOTICE OF INTENT UNDER FRE 902(11) TO OFFER CERTIFIED
RECORDS OF REGULARLY CONDUCTED ACTIVITY INTO EVIDENCE**

The United States of America, by and through undersigned counsel, respectfully provides notice that it intends to authenticate certain government exhibits (identified below) as records of regularly conducted activity pursuant to Federal Rule of Evidence 902(11). The certifications for each of these records have been produced in discovery (at the bates number listed in parentheses).

- **Bank of America** (CRP-DOJ-0000151454): Bank account records (signature card, account statements, and wire transfers) for account of Thomas Kucera (GX 12-11, 12-12). (**All references to GX refer to Government Exhibits provided to the defense by email on February 28, 2024 and include any sub-exhibits).
- **BBP Bank** (CRP-DOJ-0000477934): Bank account records (signature card, account statements, and wire transfers) for Plastiquim (GX 4-7)
- **City National Bank** (CRP-DOJ-0000172428): Bank account records (signature card, account statements, wire transfers, and supporting documents) for Los Pinos Home and JC Funds (GX 9-5, 9-6, 12-8, and 12-10).
- **Google** (CRP-DOJ-0002068184): Messages from email account johnpolit@gmail.com (GX 4-1, 4-2, 4-3, 4-4, 4-5, 4-6, 5-3, 6-2, 7-1, 7-2, 7-3, 8-8, 8-9, 9-1, 13-1, and 13-3).
- **Google** (CRP-DOJ-0000062986): Messages from email account reports.cgp@gmail.com (GX 8-6).
- **Google** (CRP-DOJ-0003142884): Messages from email account reports.jcp@gmail.com (GX 6-1, 8-5, 8-7, and 11-1).

- **Microsoft** (Polit-Homail_0000053700): Messages from email account carlospolitfaggioni@hotmail.com (GX 11-2, 11-3, 20-1, 20-2, and 20-3).
- **Merrill Lynch** (CRP-DOJ-0000308190 & 0000305585): Bank account records (signature card, account statements, and wire transfers) for Global Reinsurance and Hendricks Trading (10-1, 10-2, and 12-9).
- **State of Florida** (CRP-DOJ-0002403269, 0002403334, 0002403346, 0002403229, 0002403375, 0002403396): State of Florida corporate records for 1900 Office Building LLC, American Land Investment & Development LLC; Kuadra LLC, Invecon LLC, JC Funds LLC, and Los Pinos Home LLC. (GX 8-2, 8-3, 9-2, 9-3, 9-4, and 13-5).
- **Suntrust Bank** (CRP-DOJ-0000395447, 0003142970, and 0000404033): Bank account records (signature card, account statements, wire transfers and checks) for American Land Investments & Development, Invecon, Kuadra, JC Funds, and Venture Overseas. (GX 12-1, 12-2, 12-3, 12-4, 12-5, 12-6, 12-7, 12-13, 12-14, and 12-15).
- **Tower Bank** (CRP-DOJ-0000481079, 0002070909, and 0003142730): Bank account records (signature card, account statements, and wire transfers) for Italcom and Imobilaria Cosani (GX 6-3, 6-4, and 7-4).
- **U.S. Customs and Border Protection** (CRP-DOJ-0000151454): Travel records of Carlos Polit and John Polit from 2011 through 2013 (GX 11-4).

The United States respectfully requests leave to submit additional notifications as may be necessary.

Respectfully submitted,

MARKENZY LAPOINTE
UNITED STATES ATTORNEY

By: s/Michael N. Berger
Michael N. Berger
Assistant United States Attorney
Court No. A5501557
99 Northeast 4th Street
Miami, Florida 33132
(305) 961-9445
Michael.Berger2@usdoj.gov

GLENN LEON
CHIEF, FRAUD SECTION
Criminal Division
U.S. Department of Justice

By: /s/ Jil Simon
Jil Simon
Trial Attorney
Alexander Kramer
Assistant Chief
Criminal Division, Fraud Section
U.S. Department of Justice
Court ID No. A5502756
1400 New York Ave. NW
Washington, DC 20005
Tel: (202) 514-3257
Email: Jill.Simon@usdoj.gov

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was electronically filed with the Court's CM/ECF system on February 28, 2024.

By: s/Michael N. Berger
Michael N. Berger
Assistant United States Attorney